

## **Exhibit K**

**Robyn Trimarco**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
ROBYN TRIMARCO**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )  
; SS.:  
COUNTY OF OCEAN )

ROBYN TRIMARCO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 6 Hearth Court, Barnegat, New Jersey 08005.
2. I am currently 45 years old, having been born on March 28, 1977.
3. I am the daughter of Geraldine Krasko, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother passed away from interstitial lung disease on March 19, 2014, at the age of 64. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. My mom was a really great woman. I was very close with my mom, and we had a great relationship. Up through around 2001, I was living at home and would see her all the time when I wasn't working. We shared lots of interests and hobbies. My mom and I enjoyed making crafts together, as well as going for walks around the neighborhood. When mom wasn't busy working, we would have dinners together and would often make barbecues as a family. While

my dad would be outside cooking on the grill, I would be inside helping mom do all the prep work. We had a barbecue virtually every weekend, sometimes including my grandmother as well. Other times, I would help mom with cooking and baking. Even into adulthood, I enjoyed helping mom in the kitchen. Thankfully, my mom was fortunate enough to be at my wedding, and she was also there to see both my kids born. In fact, she was a kind and caring grandmother and had a lot of fun playing with the kids. My mom would even dress up like a clown for them, donning a clown wig and nose. I could still picture my mom chasing her grandkids around the yard. Unfortunately, when she began to experience health issues, she didn't have the energy to run after them. There were so many good memories. I just wish that she had the chance to have even more.

6. On September 11, 2001, my mom was working in the Twin Towers of the World Trade Center, as she was employed with the Port Authority of NY/NJ. She was on the 67th floor of the North Tower and miraculously descended the stairs to safety, eventually making it out of the city. Most of my mom's exposure was on 9/11 itself. I can't imagine how horrible it must have been to have all that soot and debris raining down on you. After evacuating the building, my mom tripped over a body on the ground and injured her knee. During her escape, my mom was traveling with friends from work as they looked for safe places to shelter. Eventually, my mom made it all the way over to Brooklyn. After everything that she went through that day, I thought it was a wonder that she survived being so high up in the tower. My mom was quick to leave the tower at the first sign of trouble, having worked in the World Trade Center during the attack on February 26, 1993, which then resulted in the death of six people and thousands of injuries. After 9/11, my mom was assigned to work in Jersey City for a time before her office was relocated to another area in Manhattan.

7. Since my mother's fall on 9/11 resulted in a knee injury, she later needed knee surgery. As a result, even before she began experiencing more of the respiratory issues, my mom started to slow down a bit. She wasn't walking as much as she used to walk. Soon enough, I noticed that my mom's breathing was more labored when she walked, even after short distances. I became really concerned and had a number of conversations with my father about it. My father explained that he took my mom to the doctor on a number of occasions, and the doctor's reports were never good. My mother needed oxygen tanks just to breathe, and my father all of a sudden had to make arrangements to have a stock of backup oxygen tanks just in

case they became difficult to access.

8. At the time my mom needed the oxygen tanks, I was already married, and my kids were a little bit older. As a result, I didn't see as much of what my mom went through as my dad, but I definitely remember that my mom's energy level seemed to fizzle out. Mom didn't do the activities she used to love and stopped baking altogether. In addition, she didn't cook as much. In contrast, before she became ill, my parents were both very active in the community and enjoyed lots of social events with friends. I used to call them to see if they could babysit my kids and remember hearing, "I'll check the calendar and get back to you," because my mom loved being active. Also, my mom would often go out on her own to take care of grocery shopping or head to the mall. However, once she had the respiratory issues, that had to stop because she needed help traveling around with her oxygen and didn't want to be out alone. It became more difficult for her to spend time with the grandkids too, which severely impacted her quality of life. The big change came when it was more difficult for her to physically travel to my house for dinner. At that point, she preferred to invite my family to see her, which was fine. But it was also problematic because it would make her feel compelled to cook, thinking that she had an obligation to take care of us, as the guests. All of this took a toll on my mother, physically and mentally. We should have had much more time together than we did.

9. One of the hardest things for me to experience during the time my mom was battling interstitial lung disease was to see how she wasn't able to be nearly as active as she used to be with her grandchildren. My mom tried to get down on the floor with my kids and just couldn't. My mom was so frustrated about that, which made her illness all the more heartbreaking to me. The kids were fine, they would come up to my mom and sit on the couch with her because they were just happy to spend time with grandma. Although, I knew it bothered her that she could no longer crawl around with them. When my mom was in the hospital, I really felt like she was going to be able to come home soon because the doctors described placing her in rehab with better oxygen equipment so that she can get better. However, it turned out not to be the case. I remember going and visiting my mom, the last time that I saw her. It was very rare for it to just be the two of us. That night, she said to me, "I'd rather lose my mind than my health." It was very painful to watch her say those words because she was in such bad shape that she really struggled to speak. Having to comfort my mom, who

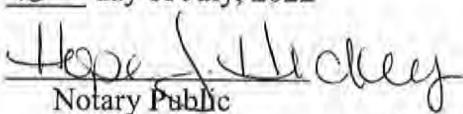
understood the seriousness of her condition and was experiencing so much physical pain, was extremely stressful for me. I tried to give my mom some encouragement and told her that she would get better and could attend my daughter's communion, but she said, "I'm not going to be there, please tell Alissa, I'm sorry." Around the time of that visit, my mom was very concerned about a test she was having the next day, which she feared would reveal that she no longer had much time to live. My mom's fears were realized because the next day, my father called and told me that my mom was going to hospice. From there, my mom never recovered and died just a few days later.

10. The whole situation is quite tragic. My mom would have had so many more years with us had it not been for this terrible illness. I wish she lived much longer to see my kids grow up. After all, as my mom had predicted, she wasn't able to make it to my daughter's communion. My kids were only five and seven years old when she passed away. My brother's kids were only slightly older, and she missed out on their childhoods. For my children, they missed out on having a really great grandmother who gave her heart and soul to them. As my kids become teenagers and I experience the challenges associated with raising them, I wish I could turn to my mom for guidance, and even ask, "Oh, my God, did I do that to you," or perhaps, even apologize for any transgression from my own teenage years. I miss her always.



ROBYN TRIMARCO

Sworn to before me this  
15<sup>th</sup> day of July, 2022



Notary Public



**Robert Lampkin**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
ROBERT LAMPKIN**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF FLORIDA        )  
                              : SS.:  
COUNTY OF VOLUSIA      )

ROBERT LAMPKIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2578 Enterprise Road, Orange City, Florida 32763.

2. I am currently 77 years old, having been born on November 8, 1944.

3. I am the brother of Michael Lampkin, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from metastatic prostate cancer on September 3, 2012. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Before he was in the NYPD, Michael was in the military. He was a Sergeant and earned a Purple Heart in Vietnam. I remember once I went to go see him on the aircraft carrier in Jacksonville, Florida. I'm a licensed clinical social worker, and I worked for the Department of Defense. We were close over the years, even though we were both overseas. Michael was my little brother.

6. At the time of 9/11, I was working for the Department of Defense in Yokosuka,

Japan. I received a call telling me, "There's a plane flying into the World Trade Center." We then received a notice from the American military base saying we were on high alert and that we had to report to the base. Once there, I got a call from Michael's girlfriend stating that he was going down to the World Trade Center site. At that time, Michael was a security guard at the Federal Courthouse. It was his retirement job after leaving the NYPD following 26 years of service. Michael witnessed the second plane hit the World Trade building. He suffered from PTSD as a result of his time in Vietnam and went into fight-or-flight mode when the attacks happened. He did what he had to do. He went down and tried to look for survivors. He was down there for many weeks, searching through the rubble and doing his part. He was a committed public servant.

7. I came back to the United States much later and called Michael to tell him I wanted to see him. That was when Michael told me that he was sick. I resided in Quantico, Virginia at the time and went up to New York to visit him in the VA hospital. They told me that Michael was diagnosed with prostate cancer. By the time they caught it, it had metastasized to other organs. Michael was then transferred to Long Island Jewish Hospital for more in depth treatment. His condition had quickly deteriorated and became terminal. His chemotherapy treatments were stopped, and it was determined that he should be in hospice. I got Michael to our family home in Queens. It was the same home that our mother and father had lived in before they died. I came up to see him more and more from Florida while he was in hospice. I visited him every weekend. We got full-time home aides for Michael because he needed constant care and supervision. He was on morphine. Michael didn't want me to tell anyone else about his illness or the severity of it. Michael was an extremely proud person—he was in the U.S. military, was a Sergeant in the NYPD, and earned a black belt in karate. He didn't want anybody to see him so ill. It affected me to see him that way. He would only allow a few close friends to see him, but he didn't want the rest of the world to know he was sick. Michael died only six months after I first came to visit him when he got sick.

8. It was really hard for me, seeing him sick in the same home that my mother and father died in. I had to take time off work for Michael's funeral, to sell his house, and take all his belongings out of the house. It was sad, moving out his awards from Vietnam and his American flag. But I wanted to give Michael a proper farewell.

9. Michael had no will, so we had a notary public to come conduct his will and

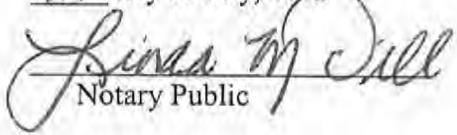
testament. That was hard. We didn't know where our sister Vicki was, but we wanted her there. Michael didn't want our other brother in the will and made me the executor. So, he left everything to me as well as some things to our adoptive sister. It was hard after that, because my family thought that I manipulated Michael to give me everything in his will. We had conflict in our family because of Michael's will. My other older brother didn't want to come to Michael's funeral after that. I also spent a lot of money on lawyers related to those family battles.

10. I can't even return to New York anymore. It's still very hard. It was so painful to go there while Michael was dying. Michael is buried on Long Island at Veterans Cemetery, in a plot next to my parents. I miss him all the time.



ROBERT LAMPKIN

Sworn to before me this  
27<sup>th</sup> day of July, 2022



Linda M. Dill  
Notary Public



**Victoria Lampkin**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA ASCIUTTO, et al.,

**AFFIDAVIT OF  
VICTORIA LAMPKIN**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

COUNTRY OF CANADA )  
: SS.:  
CITY OF NORTH VANCOUVER )

VICTORIA LAMPKIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3391 Church Street, North Vancouver, British Columbia V7K 2L3, Canada.

2. I am currently 62 years old, having been born on November 22, 1959.

3. I am the sister of Michael Lampkin, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from metastatic prostate cancer on September 3, 2012. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Michael was a quiet, reserved person. I would see him when I could, and he was often working. He was a Sergeant in the NYPD. I lived in Manhattan and worked in Midtown for many years, as well as in the Wall Street area. Michael lived in Queens, in our family home. Michael put in his 20 years in the NYPD; it was a very stressful job. But he was reserved and professional. When I lived in the family home, many years ago, we were close. Our parents

hosted weekend barbecues, and the whole family would get together. We would celebrate holidays together, such as Christmas, Mother's Day, etc.

6. I was actually living in Tribeca on September 11<sup>th</sup>, 2001. I lived on Chambers Street. I was a sales manager in Midtown. I was at my office when I learned of the disaster, and I was worried for my brother Michael. I checked in on him the night of 9/11. Michael was doing security detail right in the Ground Zero area. He told me he saw the second plane hit the World Trade Center. He was down there trying to help people as the chaos was unfolding. Even when I returned to my apartment in Tribeca two months later, I could smell the poisons in the air. It was hard to learn about Michael having these variety of illnesses as a result of his exposure at Ground Zero. Of course, it affected everyone. Michael told me what he saw, and it was truly unbelievable.

7. I know that Michael was going to the VA Hospital regularly. He was feeling really exhausted, more so than usual. They detected prostate cancer. He was receiving chemotherapy and other treatments, and our brother Robert was visiting him regularly and trying to get more information about what was going on. At first, things were alright with Michael's prostate cancer. It was an ongoing condition. Things went south after a while, and his prostate cancer spread to other areas of his body, including his pancreas. Michael was very, very weak—he definitely needed the assistance of others. My brother and family friends were there to help him.

8. Michael struggled with his mental health as well. He had some depression. He would have flare-ups in terms of his mental state. I know that Michael was frustrated with the VA Hospital, as they were often slow to provide treatment.

9. I left New York City in 2011 and went to Seattle, then moved to Canada. I was disconnected from my family for a while. Unfortunately, I didn't find out about all the goings-on until after Michael passed away. Our brother Robert was dealing with Michael's ongoing illness. He was Michael's primary caretaker. When Michael passed, Robert told me about Michael's prostate cancer and how it metastasized to other parts of his body. I left in 2011, and Michael passed in 2012.

10. I was devastated to learn of Michael's passing. He was only 65 years old. I was in total shock. The last time I had heard of Michael's prostate cancer, it was totally under control. I

thought he would be fine. It was very upsetting to know that the prostate cancer had spread and killed him. I immediately knew his illness and death were connected to Ground Zero. I myself had a cough for years, which only went away when I left New York. I knew that the EPA report that said the air was clean was bogus. Michael was in the thick of it, helping people. He didn't deserve this. It was heartbreaking to learn about how much Michael suffered during his battle with cancer.

11. All the plaintiffs in this case should be compensated commensurate with their suffering. People should be compensated for the loss of life of their loved ones, their traumas as a result, and their ongoing traumas and stress related to the World Trade Center attacks. My brother would still be here if the chemicals from Ground Zero didn't take over his body. Losing a brother at such a young age was a tragedy. The families of 9/11 victims are carrying the losses of their loved ones.

*Victoria Lampkin*

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VICTORIA LAMPKIN

Sworn to before me this  
11 day of August 2022



Notary Public

SHANETTE KEARNEY PATTERSON  
Electronic Notary Public  
Commonwealth of Virginia  
Registration No. 7883902  
My Commission Expires Sep 30, 2024

Completed via Remote Online Notarization using 2way Audio/Video technology

**Commonwealth of Virginia**

**Chesterfield County**

The foregoing instrument was subscribed and sworn to (or affirmed) before me,  
Shanette Patterson, this 11 day of August 2022 by Victoria Lampkin.



Notary Public

Notary Registration Number **7883902**

Commission Expiration Date: **September 30, 2024**

**Daniel J. Lynch**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
DANIEL J. LYNCH**

Plaintiffs,

20-CV-00411 (GBD)(SN)

-----v.  
-----

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK )

: SS.:

COUNTY OF RICHMOND )

DANIEL J. LYNCH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 49 Clove Lake Place, Staten Island, New York 10310.

2. I am currently 38 years old, having been born on May 8, 1984.

3. I am the son of Joseph W. Lynch, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer on June 27, 2012, at the age of 61. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father was a life mentor to me, whether it be teaching me work ethics, or how to fix things around the house or how to fix a car. I'm the youngest child, so even though my dad was from the school of "tough love," I was his baby boy. I think he was more lenient or softer with me than with my brothers. He and I shared a similar temperament and outlook on life. He really was my best friend and the person I chose to hang out with when I wasn't working. I

relied heavily on his advice, even when it came to my personal life. My dad had a way of knowing when a person needed advice or guidance, not just his own kids. He would help out extended family members, kids from the neighborhood, even my girlfriend, who is now my wife. He really was a patriarch of our family, in the best way. My dad was a no-nonsense guy, but he was generous and truly wanted to help people find solutions to their problems, in that same manner. If a kid had a flat tire on his bike, my dad would fix it and he'd show the kid how to do it himself. My dad was very engaging, especially when he met people who didn't have a strong role model at home. He loved teaching people how to help themselves and be independent. To me, he was Superman.

6. My father was a deckhand on the Staten Island Ferry and was working on September 11, 2001. He could see what was happening in downtown Manhattan from the ferry. I believe he continued operating the ferry that day because everything else was shut down. He was then assigned to work on the bucket-brigade, helping with the rescue and recovery efforts. In addition, he transported bodies and remains from Ground Zero to Staten Island. My dad used an old Nike book-bag of mine to carry his 9/11 gear—a hardhat, flashlight and such. I happened to come across the bag recently. It still had ash inside. The smell of concrete, dust and chemicals, brought back the memories so clearly. Twenty years later, it still had that horrible smell.

7. The family was planning a surprise 60<sup>th</sup> birthday party for my dad. That day, he went for a check-up with his cardiologist. The doctor took a 3-D scan of his heart. His heart was fine, but the doctor saw a spot on my dad's lung. He made an appointment for my dad to see an oncologist at Sloan Kettering Cancer Center to have it checked out. A few days after the party, my parents told me that my dad had lung cancer, but it was discovered relatively early. My father was extremely grateful for the cardiologist's care and getting my dad to Sloan so quickly. We were told it would be a quick procedure and my dad would recover in time to be at my wedding that summer.

8. The treatment plan was to shrink the tumor with chemotherapy and then perform surgery. Usually, they do surgery first, but this was a new type of chemotherapy. Doctors said 99 percent of patients did well with it. My dad was in the other one percent. After two treatments, he had a life-threatening reaction. I think the only reason he survived was because my mother watched over him day and night, feeding him ice-chips and keeping him hydrated. My dad was going through hell. His skin was peeling off in sheets all over his hands and body. He developed

excruciatingly painful sores in his mouth. I'd never seen anything like it.

9. I was getting married on July 28, 2012. I distinctly remember that I was visiting my dad at home during my lunch break. He said to me, "I just want to be able to make it to your wedding." I assured my dad that he would be there.

10. When my wedding was about a month away, my dad sat with my fiancé and me. He said, "Hey, kids. I don't think I'm going to be able to make it to the wedding. I said, "I know, dad. We know." That moment is seared into my brain, forever. It sticks with me. A few days after that, he was screaming for us to get him to the hospital. His legs were in so much pain, he wanted to go to the hospital and get them cut off, and he was scared. It was the only time I saw him cry. Watching him suffer through this was gut-wrenching. It's terrible to see anybody in that much pain.

11. My father died on June 27, 2012, almost one month before my wedding day. It was a terrible loss for me. I felt as though I had to put on a brave face, not to cry, to be strong like my dad. Even at his funeral, I didn't let myself shed a tear. I don't know how I got through his eulogy.

12. My kids have never met my father. They hear about him from family members and people who knew him from the neighborhood or from work. They'll stop me in the street to share stories about the time my dad helped them. He was an unbelievable person. Everybody who he came across thought so. It's great to hear people reminisce about my dad. It makes me proud that my kids hear about him. I know people mean well by sharing, and it's nice. Sometimes, I have a good laugh, but it's very difficult, too. It kind of re-opens a wound inside of me. Even after all this time, I can't talk about it without getting emotional.



DANIEL J. LYNCH

Sworn to before me this

11<sup>th</sup> day of July, 2022

Khaelid Ware

KHAELID WARE  
Commissioner of Deeds  
City of New York No. 3-7513  
Commission Expires 11-1-2022

Notary Public